

**REMARKS**

Before this Amendment, claims 1-3, 8-10, and 13-17 were present for examination. No additional claims have been cancelled. Claims 1-3, 8, 9, 15, and 16 are amended and claim 18 is added. Before this Amendment, claims 14 and 17 already recited a “resolved” signal and a “resolved” node. Thus, a “resolved” value is not new matter. Because no new matter has been added, the amendments and addition do not necessitate a new search. Applicants respectfully request reconsideration of this application as amended.

The Office Action initially objected to claim 15 and rejected at least claim 1 and its dependent claims under 35 U.S.C. § 102 as being anticipated by SPICE 2G.1 User’s Guide (“SPICE”). The Office Action also initially rejected claim 1 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,428,800 (“Hsieh”), rejected claim 2 under 35 U.S.C. § 103(a) as being unpatentable over Hsieh in view of U.S. Patent No. 5,202,593 (“Huang”), rejected claims 3, 8, and 16-17 under § 103(a) as being unpatentable over Hsieh, in view of U.S. Patent No. 4,922,445 (“Mizoue”), and rejected claims 9, 10, and 13-15 under § 103(a) as being unpatentable over Hsieh, in view of Mizoue and Huang.

**Claim Objections**

The Office Action initially objected to claim 15. Claim 15 has been amended to clarify which values the claim refers to.

**35 U.S.C. § 102 Rejections, SPICE**

The Office Action initially rejected “at least . . . claim 1 and dependent [claims]” under 35 U.S.C. § 102 as being anticipated by SPICE.

Claim 1 has been amended to recite “a resolved value based upon at least the first value and second value.” SPICE cannot support a bi-directional signal comprising a resolved value as recited in claim 1. Rather, the devices that SPICE can support are limited to DIODE,

BJT, JFET, and MOSFET as shown on SPICE pages 30 to 37. In addition, according to SPICE page 1, SPICE only supports “**built-in** models for [these four] semiconductor devices.”

Consequently, SPICE discourages or at least does not teach **building a new** model of a device as shown in the present invention. Thus, it is clear that SPICE does not teach **modeling a bi-directional signal comprising a resolved value** as recited in claim 1.

The Office Action next suggested that “[s]ub-circuit design allows for **combination of models** to design complex circuits.” However, the present invention reflects a **decomposition of one model**, namely a bi-directional signal of an electric circuit, into a first value, a second value, and a resolved value. Even if SPICE teaches decomposition of one model, SPICE still fails to teach a resolved value, especially a resolved value that “reflects a combination of the first value and second value” as recited in newly added claim 18.

Therefore, claim 1 and its dependent claims 2-3 and 18 are in condition for allowance because SPICE fails to teach modeling a bi-directional signal comprising a resolved value. Claims 8-10 and 13-17 are also in condition for allowance at least for the same reason.

**35 U.S.C. § 102 Rejection, Hsieh**

The Office Action also initially rejected claim 1 under 35 U.S.C. § 102(e) as being anticipated by Hsieh. The Office Action stated on page 3:

“Hsieh ‘800 clearly teaches using FPGA (used in art for modeling circuits) to design input output interconnects. (Hsieh ‘800: Col. 1 Lines 25-37). FPGA as taught by Hsieh ‘800 shows a system for modeling interconnect or I/O (bidirectional) signals.”

The Office Action also made similar remarks on pages 5-8. However, lines 49-54 of the cited column teach away from using FPGA to model a bi-directional signal:

“While programmable FPGAs are very useful, they have some limitations. All input/output signals must be unidirectional, and all signals must be of the same logic level. Thus the FPGAs **cannot** be connected to bi-directional buses and cannot interface differing types of devices such as CMOS and TTL devices.”

Thus, Hsieh does not teach using an FPGA to model a bi-directional signal. Even if Hsieh did teach using FPGA to model a bi-directional signal, nowhere in Hsieh does Hsieh teach **modeling** a bi-directional signal comprising a resolved value using a field programmable interconnect device ("FPID"). Rather, Hsieh teaches **implementing** a particular bi-directional buffer using FPID.

In addition, the particular bi-directional buffer that Hsieh implements is distinguishable from the present invention at least because Hsieh need not and does not teach a resolved value. The buffers in the present invention point **toward** each other and their outputs are **connected** to each other. However, as illustrated in Figure 4 of Hsieh and reproduced below, the buffers in Hsieh point **away** from each other and their outputs are **disconnected** from each other:

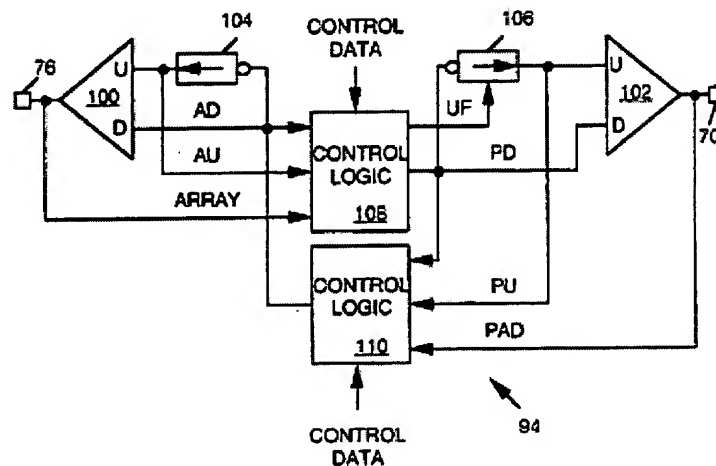


FIG. 4

Because the two buffers in Hsieh point **away** from each other and their outputs are **disconnected** from each other, Hsieh need not and does not teach a resolved value as recited in claim 1. The Office might contemplate construing single shot device 104 as generating a resolved value. However, Figure 4 clearly shows single shot device 104 as providing input into buffer 100, rather than receiving input from buffer 100 in order to generate a resolved value.

Therefore, claim 1 and its dependent claims 2-3 and 18 are in condition for allowance at least because Hsieh fails to teach modeling a bi-directional signal comprising a resolved value.

**35 U.S.C. § 103 Rejection, Hsieh in view of Huang**

The Office Action initially rejected claim 2 under 35 U.S.C. § 103(a) as being unpatentable over Hsieh in view of Huang. As noted previously, Hsieh fails to teach modeling a bi-directional signal comprising a resolved value. Also as noted previously, Hsieh teaches away from using FPGA to model a bi-directional signal. Thus, Hsieh fails to teach or suggest modeling a bi-directional signal comprising a resolved value.

The combination of Hsieh with Huang fails to remedy Hsieh's deficiency. Nowhere in Huang does Huang teach or suggest **modeling** a bi-directional signal comprising a resolved value. Rather, Huang is directed to **implementing** a bi-directional bus repeater. Like Hsieh, the two buffers in Huang point **away** from each other and their output are **disconnected** from each other. Consequently, Huang need not and does not teach a resolved value.

Claim 2 has also been amended to recite "resistive data which models at least a portion of resistance coupled to an electric circuit." None of the references, alone or in combination, teaches or suggests "resistance **coupled** with said electric circuit" as recited in claim 2. Rather, the only reference of resistance is the internal resistor **contained within** buffer 16 as shown in Figure 2 of Huang. An internal resistor that is **contained within** a buffer is clearly not resistance **coupled** with an electric circuit.

Therefore, claim 2 is also allowable because none of the references, alone or in combination, teaches or suggests every element of claim 2.

**35 U.S.C. § 103 Rejections, Hsieh in view of Mizoue**

The Office Action initially rejected claims 3, 8, and 16-17 under § 103(a) as being unpatentable over Hsieh in view of Mizoue. As noted previously, Hsieh fails to teach or suggest

modeling a bi-directional signal comprising a resolved value. The Mizoue reference fails to remedy Hsieh's deficiency. Not only does Mizoue fail to teach or suggest modeling a bi-directional signal comprising a resolved value but also Mizoue is from a different field. The Office Action recognizes on page 2 in referring to the SpiceI reference that the presently claimed invention is directed at modeling analog circuits. Namely, the Office Action stated: "Model Card describing a model and having various levels of input and out[put] as [an] **analog circuit**" because the present claimed invention involves an analog circuit. However, Mizoue is directed to a **logic circuit** simulation method. Thus, the combination is not operable to generate a resolved value of an analog circuit.

Claim 8 recites a method for modeling a bi-directional signal comprising a resolved value of claim 1. Likewise, claim 16 recites a method for operating an improved pad cell model based on claim 1. Therefore, just like claim 1 is allowable, both claims 8 and 16 are allowable because none of the references, alone or in combination, teaches or suggests every element of each claim. Accordingly, claims 3 and 17 are each allowable for being dependent from an allowable independent claim.

**35 U.S.C. § 103 Rejections, Hsieh in view of Mizoue and Huang**

The Office Action initially rejected claims 9, 10, and 13-15 under § 103(a) as being unpatentable over Hsieh, in view of Mizoue and Huang. As noted previously, neither Mizoue nor Huang remedy Hsieh's deficiency. Also as noted previously, claim 8 is allowable because none of the references, alone or in combination, teaches or suggests a bi-directional signal comprising a resolved value. Claims 9-10 are thus allowable for being dependent from allowable independent claim 8. Claims 14-15 are likewise allowable because none of the references, alone or in combination, teaches or suggests a bi-directional signal comprising a resolved value.

Claims 9, 10, and 13-15 are also allowable for reciting additional elements that none of the references, alone or in combination, teaches or suggests. Claim 9 recites in part a

Because input/output **buffers** are clearly distinguishable from an I/O **pad**, Hsieh and Huang do not teach or suggest modeling a pad cell or a bi-directional pad. As noted previously, Hsieh or Huang teach **implementing** their particular input/output **buffers**. However, even if Hsieh or Huang's teachings of **implementing** input/output **buffers** could be construed as teachings of **modeling** input/output **buffers**, Hsieh and Huang still do not teach or suggest **modeling** a **pad** cell or a bi-directional **pad**.

Page 10 of 11

and a bi-directional pad are not logic devices as they do not perform any logic. Thus, even if Hsieh and Huang do teach modeling input/output buffers or even a bi-directional pad, Mizoue's teaching of **logic circuit** simulation and storing the simulation results is not combinable with input/output buffers or even a bi-directional pad.

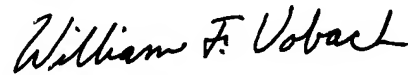
Therefore, claims 9, 10, and 13-15 are allowable because none of the references, alone or in combination, teaches or suggests every element of each claim.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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